

# Memorandum

Mr. Steve Yaeger  
CALFED Bay-Delta Program

Date : March 21, 1997

From : Department of Fish and Game

Subject : DFG Comments on Draft Strategy on San Joaquin River Water Quality Problem

We believe that substantial revisions are needed in the next version of the draft statement. The general thrust of our concerns is actions focus too much on the San Joaquin Valley Drainage program, and other appropriate strategies are not dealt with sufficiently.

The paper starts with a good list of water quality problems in the San Joaquin River. Note that only the second and perhaps third bullets are in the purview of the San Joaquin Valley Drainage Program.

The paragraph following the list of problems drifts from a broad statement attributing the most significant degradation to agricultural drainage and return flows to salt being the principal problem. We agree with the conclusion that the most significant problems are caused by agricultural drainage and return flows, but both salt loads and toxics are of considerable importance, and this statement is clearly and appropriately broader than the subsurface drainage problem. While salt load is the main threat to the long-term viability of agriculture, toxics are clearly a substantial environmental threat. The paragraph should clearly distinguish between the salt and toxics problems and the various sources of both.

The next two paragraphs go on to essentially describe cooperation with the San Joaquin Valley Drainage Program creating the implication that it is the whole of the CALFED Water Quality Program in the San Joaquin system. While we recognize that this strategy paper is driven by the need to explain the relationship between CALFED and the Drainage Program, one of two approaches need to be adopted. One is to define the paper as dealing only with the subsurface agricultural drainage issue. The other is to describe the strategies CALFED plans to use with all six problem areas listed on the first page. We lean towards the latter, but recognize that the former is probably viable for the purposes driving the paper.

Whichever approach is used, two general changes are needed in the treatment of the Drainage Program. One is that while the first bullet of the list on page two removes consideration of Tulare Lake Basin drainage issues from the CALFED Program, the intent would be clearer if that was stated directly. Consideration should be given to keeping the Tulare Lake Basin in as it relates to how future strategies to address drainage issues in that basin may affect sustaining the recovery of a healthy Bay-Delta.

Mr. Steve Yaeger  
March 21, 1997  
Page Two

The second change may be more difficult. The Drainage Program has not been funded very well and questions exist in the minds of at least some interests as to how effective it has been. In addition, we understand that the program has started to question the underlying strategy on which it was based. Namely, the underlying premise that the purpose was to implement in-valley management measures to contain the drainage problem for 40 or 50 years while a feasible permanent solution was found. Considering these issues, we question whether a CALFED strategy will be perceived as viable without addressing those issues in some fashion.

Thank you for the opportunity to comment on the draft.

*Cindy Costa*  
for:  
Pete Chadwick  
DFG/CALFED Liaison

cc: Mr. Rick Woodard, CALFED  
Mr. Frank Wernette, BDD  
Mr. Jim White, ESD

HCK97c62.wpd/emc